



Docket No.: 3350-03  
Client No.: RPP-3

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

283

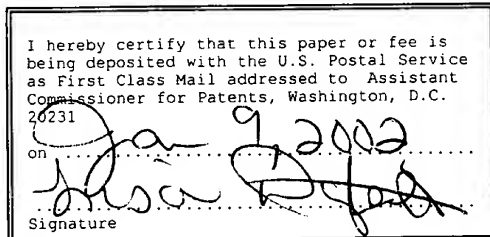
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Technology Center 2100

In re Application of :  
GARRISON et al. :  
: Group Art Unit: 2187  
Application No.:08/994,363 :  
: Examiner: R. Elmore  
Filed: December 19, 1997 :  
:  
For: ELECTRONIC BILL PAYMENT USING ACCOUNT RANGING TO DETERMINE  
THE APPROPRIATE ONE OF MULTIPLE PAYMENT REMITTANCE CENTERS ©  
A SINGLE PAYEE

Honorable Assistant  
Commissioner  
for Patents  
Washington, DC 20231



Sir:

An Appeal Brief is submitted herewith in triplicate, in support of the Notice of Appeal filed August 17, 2001. A check for the Appeal Brief fee, in the amount of \$320.00, is enclosed.

The Commissioner is hereby authorized to charge any additional fees associated with this communication or credit any overpayment, to Deposit Account No. 12-0429, including any patent application processing fees under 37 CFR 1.17.

Respectfully Submitted,  
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Date: January 9, 2002

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1 of 3

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A SINGLE PAYEE

#16  
Appeal Brief  
Ext of time  
2/6/02  
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Honorable Assistant  
Commissioner  
for Patents

Washington, DC 20231

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APPEAL BRIEF

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Washington, D.C. 20231

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Sir:

This Appeal Brief is submitted in support of the Notice of  
Appeal filed August 17, 2001.

I. REAL PARTY IN INTEREST

CheckFree Corporation is the real party in interest.

II. RELATED APPEALS AND INTERFERENCES

None

### **III. STATUS OF CLAIMS**

Claims 1-20 are pending. Each of claims 1-20 is under appeal.

### **IV. STATUS OF AMENDMENTS**

Amendments were filed on November 30, 1999 and November 29, 2000. A Request for Reconsideration was filed on April 25, 2000. The Amendments filed on November 30, 1999 and November 29, 2000 have been entered.

### **V. SUMMARY OF INVENTION**

The present application is directed to an electronic remittance payment processing technique for determining a proper payee remittance center based upon a payor account number with the payee provided by the payor.

As summarized on page 6, line 16, through page 7, line 11, in a preferred embodiment of the invention, payment information, including a payor's account number with a payee, is transmitted from a first network station, e.g. a payor station. A second network station, e.g. a payment processing server, receives the transmitted payment information and processes the payor account number to select one of a plurality of remittance centers associated with the payee to which payment is to be made. Additional aspects of the invention are also disclosed and claimed, as will be summarized below.

As recited in claim 1 and described in the context of a preferred implementation with reference to Figures 2 and 5, page 13, line 3, through page 16, line 21, and page 19, line 14, through page 21, line 7, a computer implemented remittance payment process includes receiving a payor (e.g. a consumer 8) request to make a payment to a payee (e.g. a merchant and as in step 51 of Figure 5 by processor 17 of RPP 3, and described at page 13, line 25, through page 14, line 1). The payee has a plurality of remittance centers (e.g. as described on page 19, line 23, through page 20, line 1). The request includes information identifying a payor account number with the payee (e.g. as described on page 14, lines 1-4). The account number is processed (e.g. as in steps 53 and 55

of Figure 5 by processor 17 of RPP 3, and described on page 20, lines 1-24) to select a single remittance center of the plurality of remittance centers to which payment is to be made. Payment is made to the single remittance center (e.g. as in step 58 of Figure 5, and as described on page 20, lines 3-4).

As recited in claim 2, the account number is preferably processed to identify information of the account number which corresponds to the single remittance center (e.g. as described on page 7, lines 6-7, and page 19, lines 17-23).

According to claim 3, the identified information of the account number includes one or more alphanumeric characters identifying the single remittance center (e.g. as described on page 7, lines 8-11, and page 20, lines 10-24).

As recited in claim 4 and described with reference to Figures 2-4 and page 16, line 22, through page 19, line 13, the information (e.g. payment request) includes payee name and address data (e.g. as described on page 15, lines 10 and 11). A database (e.g. merchant database 18) of payee records (e.g. records 1-N of Figure 4) is provided. The information (e.g. payment request) is processed (e.g. as in step 66 of Figure 3, by the processor 17 of RPP 3 and described on page 18, lines 1-3) to produce an eleven digit zip code (e.g. zip 82 of Figure 4) for the payee. The database (e.g. merchant database 18) is accessed (e.g. as in step 66 of Figure 4 by the processor 17 of RPP 3 and described on page 18, lines 9-14) to locate payee records (e.g. records 1-N of Figure 4) corresponding to the eleven digit zip code (e.g. zip code 82).

According to claim 5, and with reference to Figure 6 and page 21, line 8, through page 23, line 17, alteration rules (e.g. alteration rules 44 of Figure 6) are stored in a database (e.g. merchant database 18). The alteration rules indicate a form in which the payee is to receive the account number (e.g. as described on page 22, line 24, through page 23, line 2). The received account number is transformed (e.g. in step 46 of Figure 6 by the RPP 3, as described on page 23, lines 2-17) into an altered account number according to the alteration rules (e.g. alteration rules 44 of Figure 6).

According to claim 10, the payor account number is verified

for conformity to validation rules (e.g. validation templates 40 of Figure 6) indicating expected values for fields of the payor account number (e.g., in step 42 of Figure 6 by RPP 3, as described on page 22, lines 12-20).

In view of the above, a further description of the elements of system claims 6-9, system claims 16-20, and software claims 11-15 is considered to be unnecessary.

## **VI. ISSUES**

Whether claims 1-20 are anticipated by Chasek (U.S. Patent No. 5,420,405) under 35 USC § 102(b).

## **VII. BRIEF DESCRIPTION OF THE REFERENCE**

Chasek (U.S. Patent No. 5,420,405) discloses an electronic money system (shown in Figure 1a) in which an individual mobile personal terminal (PT 101) can be used to conduct transactions with a vendor terminal (VT 102), as well as other personal terminals.

A PT 101, belonging to a payor, is associated with a personal account custodian terminal (PAC 105). A PAC 105 maintains an account associated with the PT 101 and represents the payor much like a bank (see, for example, column 3, lines 33-35, and column 9, lines 3-6). A VT 102, belonging to a vendor, is associated with a vendor account custodian terminal (VAC 103). A VAC 103 maintains an account associated with the VT 102 (see, for example, Figure 6, detail 602, and column 3, lines 48-50).

The medium of exchange of the Chasek system is a transaction packet that includes information necessary to complete a transaction (see, for example, column 1, lines 41-49). Transaction packets are exchanged between PACs and VACs via a clearinghouse (e.g., satellite 104) (see, for example, column 2, lines 15-17).

A PT 101 includes a memory maintaining a running account (see, for example, Figure 2d, column 2, lines 23-25, and column 5, lines 12-27) from which each transaction is debited (see, for example, column 3, lines 22-24). The account (e.g. debit and credit account) is periodically credited by the PAC 105 associated with the PT 101 (see, for example, column 3, lines 42-43, and 51-58, and column 8, lines 14-33).

To execute a transaction, a PT 101 and VT 102 are brought within a proximity of one another (see, for example, column 3, lines 20-21). A determination as to if the running account stored in the PT 101 has sufficient funds for the transaction is made. If sufficient funds are available, the transaction is completed (see, for example, column 6, lines 19-31). The VT 102 stores information associated with completed transactions (e.g. transaction packets) (see, for example, column 3, lines 24-25, and column 6, lines 46-48). As described in column 6, lines 34-39, this information includes information identifying the PAC 105 associated with the PT 101 (e.g. PAC-ID), information identifying a customer associated with the PT 101 (e.g. customer's PIN), information identifying a vendor associated with the VT 102 (e.g. vendor's IDN), and transaction amount.

The information identifying the vendor is obtained from the VT 102 (see, for example, column 6, lines 38-39, and column 7, lines 23-24)). The information identifying the PAC 105 and identifying the customer is obtained from the PT 101 (see, for example, column 6, lines 7-8, and 33-36, and column 7, lines 17-18).

Stored transaction packets are periodically transferred from the VT 102 to the VAC 103 associated with that VT 102 (see, for example, column 3, lines 24-28, and column 6, lines 47-49). The VAC 103 credits the vendor's account in the amount of each transaction, sorts the transactions according to the PAC 105 with which each transaction is associated, and forwards the sorted transactions (via satellite 104) to the appropriate PAC 105 (see, for example, column 3, lines 28-33). The receiving PAC 105 performs cash settlement with the forwarding VAC 103 (see, for example, column 3, lines 39-41).

#### **VIII. THE REJECTION**

Claims 1-20 stand finally rejected under 35 USC §102(b) as anticipated by Chasek (U.S. Patent No. 5,420,405). The rejections are detailed in a non-final Official Action dated August 8, 2000 and a Final Official Action dated February 27, 2001.

In the non-final Official Action of August 8, 2000, the Examiner points to Figures 3C-6, column 1, lines 41-51, column 3, line 15, through column 4, line 41, column 5, lines 28-46, and column 7, line 10, through column 8, line 33, as disclosing all features recited in the claims.

With regard to independent claims 1, 6, 11, and 16, the Examiner points to Figures 3C-6 and column 1, lines 41-51, as disclosing receiving a request to make a payment to a payee having a plurality of remittance centers, the request including a payor account number with the payee. The Examiner argues that the vendor account custodian (VAC) is equivalent to remittance centers.

The Examiner further points to column 3, lines 15-41, as disclosing processing the payor account number to select a single remittance center to which payment is to be made. The Examiner further argues, by pointing to column 3, line 42, to column 4, line 7, that directing payment to a single remittance center is taught by Chasek's determination of the actual vendor of a service or product.

With regard to claims 2, 7, 12, and 17, the Examiner points to column 3, lines 42-50 as disclosing processing the payor account number to identify information of the account number which corresponds to the single remittance center.

With regard to claims 3, 8, 13, and 18, the Examiner argues that Chasek inherently teaches that the identified information of the account number includes one or more alphanumeric characters identifying the single remittance center "because all identifying data must be in the form of alphanumeric characters within the computer system."

With regard to claims 4, 9, 14, and 19, the Examiner points to column 7, line 10, through column 8, line 33, as disclosing processing information to produce a zip code and accessing a database to locate payee records corresponding to the zip code. The Examiner argues that the requirements are "taught as databases for storing information which identifies the payees, payors, and additional members of the network."

With regard to claims 5, 10, 15, and 20, the Examiner points to column 4, lines 8-41, and column 5, lines 28-46, and argues that

storing in a database alteration rules for a payee and transforming received payor account number into an altered account number according to the alteration rules is taught by "being able to reprogram the PROMs and EEPROMs used in the system". However, the Examiner provides no rationale for this conclusion.

In the Final Official Action of February 27, 2001, responsive to a Request For Reconsideration filed November 29, 2000, the Examiner argues that intermediate type addressing allows a personal terminal (PT) to send a transaction packet to a clearinghouse which then sorts the packet and transmits it to the appropriate personal account custodian. The Examiner further argues that the network connectivity associated with the clearinghouse function is equivalent to a plurality of remittance centers associated with a single payee.

Regarding the processing of a payor account number to select the remittance center to which payment is to be made, the Examiner now argues that information such as an account number must be used in order for payments to be credited to the appropriate account.

Regarding claims 4, 9, 14, and 19, the Examiner now argues that because the Chasek system can keep track of home base data or clearinghouse data such as telephone numbers or tax information, this data type and management is equivalent to address type data.

Regarding alteration rules, the Examiner now relies upon the referenced text disclosing use of "programmable memory which allows the payee to change the requirements for accepting payment from an individual." The Examiner provided no further arguments in this respect.

In an Advisory Action dated August 9, 2001, responsive to a Request For Reconsideration filed April 25, 2001, the rejections are maintained without additional rationale.

#### **IX. GROUPING OF CLAIMS**

The invention is defined within independent claim groupings (i) 1-5, (ii) 6-10, (iii) 11-15, and (iv) 16-20. However, the claims of each independent claim grouping do not stand or fall together. Each of claims 1-20 requires features which form an independent basis for allowance.



## X. ARGUMENT

Appellants respectfully traverse the rejections based on the prior art applied against the claims now pending on appeal. As discussed below, it is respectfully submitted that the Examiner has not met the burden of proof in establishing that the appealed claims are anticipated, has failed to provide the required factual basis and reasonable rationale for the rejections, and has failed to apply art which teaches or suggest the invention as claimed.

### 1. THE EXAMINER HAS FAILED TO ESTABLISH A PRIMA FACIE CASE

The initial burden of establishing a basis for denying patentability to a claimed invention rests upon the examiner. In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Thorpe, 777 F.2d 695, 227 USPQ 964 (Fed. Cir. 1985); In re Piasecki, 745 F.2d 1468, 223 USPQ 785 (Fed. Cir. 1984).

The Examiner must provide sufficient factual basis or rationale as to how features of the invention recited in the claims are taught or suggested in the applied art. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988). The limitations required by the claims cannot be ignored. See In re Wilson, 424 F.2d 1382, 165 USPQ 494 (CCPA 1970). No claim limitation, including one which is functional, can be ignored. See In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981). All words in a claim must be considered in deciding the patentability of that claim against the prior art. Each word in a claim must be given its proper meaning, as construed by a person skilled in the art. Where required to determine the scope of a recited term, the disclosure may be used. See In re Barr, 444 F.2d 588, 170 USPQ 330 (CCPA 1971).

As discussed above, each of Claims 1-20 stand finally rejected under 35 USC §102(b) as anticipated by Chasek (U.S. Patent No. 5,420,405).

Each of independent claims 1, 6, 11, and 16 requires receiving a request for payment to a payee having a plurality of remittance centers. Further, each independent claim requires that a payor account number with the payee be received with the request and processed to select a single remittance center to which payment is

to be made.

To establish a prima facie case, the Examiner must provide sufficient factual basis or rationale as to how features of the invention recited in the claims are taught or suggested in the applied art.

As discussed above, in the Official Action of August 29, 2000, the Examiner points to the VAC as being equivalent to the plurality of remittance centers. However, as disclosed by Chasek in column 3, lines 15-41, each vendor has only one VAC.

In the Final Official Action of February 27, 2001, the Examiner argues that intermediate type addressing allows a PT to send a transaction packet to a clearinghouse which then sorts the packet and transmits it to the appropriate PAC. The Examiner further argues that the network connectivity associated with the clearinghouse function is equivalent to a plurality of remittance centers associated with a single payee. However, the clearinghouse function to which the Examiner refers (see, for example, Figure 1A and column 3, lines 35-39), takes place after transaction packets are forwarded to the VAC, and does not alter the fact that Chasek discloses only one VAC 103 to which all transactions for a particular vendor are routed (see, for example, column 3, lines 24-28). Chasek discloses that the clearinghouse function involves sending each transaction packet from the single payee remittance center (i.e., VAC) to the appropriate PAC so that the vendor's account can be properly credited and paid from the correct purchaser's account. Hence, Chasek lacks any teaching, or for that matter suggestion, of the required plurality of payment remittance centers associated with a single payee.

Regarding the processing of a payor account number with the payee to select the remittance center to which payment is to be made, the Examiner argues in the Final Official Action of February 27, 2001 that information such as an account number must be used in order for payments to be credited to the appropriate account. In other words, says the Examiner, necessary accounting information for any type of payment teachings would inherently use identification information to credit a payment.

While Chasek does disclose that various transaction

information is sent from the PT to the VAC, the transmitted information as disclosed by Chasek (see, for example column 6, lines 29-39), does not include a payor account number with the payee, as required by each of the independent claims, but at best a payor account number identifying an account at the payor's PAC. Hence, Chasek lacks any teaching or suggestion of the required processing of a payor account number with a payee to identify the single remittance center.

Claims 2, 7, 12, and 17 require that the payor account number with the payee be processed to identify information of the account number which corresponds to the single remittance center.

As discussed above, the Examiner relies upon Chasek's disclosure in column 3, lines 42-50 as corresponding to the recited limitations. The referenced text relates to crediting funds to a PT from a PAC, as well as a PT and a VT communicating via telephone to complete a transaction. Further, as discussed above, Chasek's VAC (which the Examiner equates to a remittance center) is not one of a plurality of remittance centers of a single payee (e.g. a single vendor). Rather, Chasek expressly discloses that each vendor is associated with only a single VAC. Hence, Chasek has no need to process an account number to select or identify one of a plurality of remittance centers associated with one payee (e.g. vendor). Accordingly, Chasek does not teach or suggest the requirements of claims 2, 7, 12, and 17.

Claims 3, 8, 13, and 18 each require that the identified information of the payor account number with the payee include one or more alphanumeric characters identifying the single remittance center.

The Examiner asserts that Chasek inherently teaches account number characters which identify a single remittance center. However, Chasek teaches only a single VAC for each vendor and fails to in any way suggest that a payee could have multiple remittance centers. Hence, Chasek has no need to made a selection or identify one of multiple remittance centers and accordingly lacks any need for or disclosure of identifying or selecting such a single remittance center based on account number characteristics which identify a single remittance center, as required by claims 3, 8,

13, and 18.

Claims 4, 9, 14, and 19 each require a database of payee records, processing information to produce an eleven digit zip code for the payee, and accessing the database to locate payee records corresponding to the eleven digit zip code. As discussed above, the Examiner relies upon Chasek at column 7, line 10, through column 8, line 33 as disclosing the required features.

The Examiner's position is not understood. The referenced text lacks any suggestion of the required processing of received information to generate a zip code that should be or could be used to access a database record. Accordingly, Chasek lacks any disclosure of the processing of payment information to produce a zip code and the accessing of a database to locate records corresponding to the produced zip code as required by claims 4, 9, 14, and 19.

Claims 5, 10, 15, and 20 each require altering the received payor account number with the payee according to alteration rules.

As discussed above, the Examiner argues that re-programmable devices such as PROMs and EEPROMs correspond to stored alteration rules relating to the format in which the payee is to receive a payor account number and can be used to transform a received account number into an altered account number according to the alteration rules, but fails to provide any rationale whatsoever for these conclusions. Accordingly the Examiner's position is not understood.

Further, Chasek lacks any disclosure of storing alteration rules indicative of a format in which a payee expects to receive an account number and transforming an account number into an altered account number according to such rules as required by claim 5, or of verifying an account number according to validation rules and altering an account number according to alteration rules as required by claim 10, or transforming an account number into an altered account number according to alteration rules as required by claim 15, or storing alteration rules indicative of a format in which a payee expects to receive an account number and transforming an account number into an altered account number according to such rules as required by claim 20.

Hence, it is respectfully submitted that the Examiner has failed to establish a prima facie basis for the rejection of the claims in the Final Official Action.

## 2. THE APPLIED REFERENCE FAIL TO TEACH THE CLAIMED INVENTION

Anticipation, under 35 U.S.C. §102, requires that each element of the claim in issue be found, either expressly described or under principles of inherency, in a single prior art reference. Although anticipation requires only that the claim under attack "read on" something disclosed in the reference, all limitations of the claim must be found in the reference, or "fully met" by it. See Kalman v. Kimberly-Clark Corp., 713 F.2d 760, 218 USPQ 781 (Fed. Cir. 1983).

Inherency requires certainty, not speculation. In re Rijckaert, 9 F.3rd 1531, 28 USPQ2d 1955 (Fed. Cir. 1993); In re King, 801 F.2d 1324, 231 USPQ 136 (Fed. Cir. 1986); W. L. Gore & Associates, Inc. v. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983); In re Oelrich, 666 F.2d 578, 212 USPQ 323 (CCPA 1981); In re Wilding, 535 F.2d 631, 190 USPQ 59 (CCPA 1976). Objective evidence must be relied upon to defeat the patentability of the claimed invention. Ex parte Natale, 11 USPQ2d 1222 (BPAI 1988).

As discussed above, in the Final Official Action issued February 27, 2001, all of the pending claims (i.e., claims 1-20) stand rejected under 35 USC §102(b) as anticipated by Chasek.

Chasek discloses an electronic money system in which funds are exchanged via PTs and VTs). As discussed above, a PT includes a memory storing an account balance. In a transaction, information identifying a PAC at which an actual funding account of the PT is maintained, as well as information identifying a payor, is transmitted from a PT to a VT. Each PT is associated with only one PAC. This information transmitted to the VT by the PT is then bundled into a transaction packet by the VT. The VT adds to the transaction packet information indicating the amount of the transaction as well as information identifying the vendor.

The VT sends the transaction packet to the VAC associated with the VT. Each VT is associated with only one VAC. The VAC determines, from the transaction packet, the one PAC with which the payor is associated. The VAC then transmits the transaction packet,

via a satellite (a.k.a. clearinghouse), to the determined PAC. The PAC, upon receipt of the transaction packet, performs a settlement function in which it transfers funds to cover the transaction to the VAC.

Each of independent claims 1, 6, 11, and 16 requires that a request for payment include a payor account number with a payee having a plurality of remittance centers.

Chasek lacks any disclosure or suggestion of receiving a payor account number with a payee. At best, Chasek discloses a payor account number (e.g. customer's pin) with his PAC. It is not surprising that Chasek does not disclose a payor account number with a payee, as Chasek is fundamentally not a bill paying system and would have no need for the payor to reference a payor account number assigned by the payee. All that the payor need provide in Chasek is enough information for the vendor's VAC to determine the payor's PAC, and for the payor's PAC to identify the payor.

Chasek also in no way teaches or suggests a payee (vendor) having a plurality of remittance centers. Rather, in Chasek, each payee (vendor) is expressly associated with a single VAC, as discussed above. Further, in accordance with the Chasek system, a payor directly pays a vendor by the payor's PT communicating with the vendor's VT. This communication can be done with the PT and VT in physical proximity to one another, or via telephone. In any event, a vendor's PT directly receives payment from a payor's PT. The vendor's PT then sends a transaction packet, containing information associated with the transaction, to the vendor's one VAC.

Each of independent claims 1, 6, 11, and 16 also requires that the payor account number be processed to determine a single remittance center of the plurality of remittance centers to which payment is to, or should, be made or sent.

As discussed above, Chasek simply does not teach or suggest a payor account number with a payee, or a payee having multiple remittance centers. Therefore, Chasek necessarily does not disclose processing a payor account number with a payee to determine a single remittance center of the plurality of remittance centers.

Claims 2, 7, 12, and 17 require that the payor account number

with the payee be processed to identify information of the account number which corresponds to the single remittance center.

Also as discussed above, since Chasek does not disclose a payor account number with a payee, or a payee having multiple remittance centers, Chasek necessarily does not disclose identifying information of the account number which corresponds to single remittance center.

Claims 3, 8, 13, and 18 each require that the identified information of the payor account number with the payee include one or more alphanumeric characters identifying the single remittance center. As above, Chasek necessarily does not disclose such requirement, as Chasek does not teach or suggest a payor account number with a payee or a payee having multiple remittance centers.

Claims 4, 9, 14, and 19 each require a database of payee records, processing information received from the payor to produce an eleven digit zip code for the payee, and accessing the database to locate payee records corresponding to that eleven digit zip code.

Chasek simply does not teach or suggest any zip code, let alone processing information to produce an eleven digit zip code for the payee. Furthermore, location of payee records corresponding to a produced eleven digit zip code is certainly not taught or suggested by Chasek.

Claims 5, 10, 15, and 20 each require altering the payor account number with the payee according to alteration rules. Further, claim 10 requires verifying that the payor account number with the payee confirms to validation rules indicating expected values for fields of the account number. Discussed above, Chasek does not teach or suggest a payor account number with a payee, let alone altering and/or verifying a payor account number with a payee.

#### **CONCLUSION**

It is respectfully submitted that the Examiner has (i) failed to establish a prima facie case for the rejection, (ii) failed to reasonably construe that which is taught and suggested by the applied prior art combination, and (iii) failed to apply art which

teaches the claimed invention.

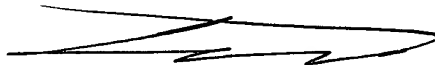
Thus, it is respectfully submitted that the rejection of claims 1-20 as being anticipated by Chasek under 35 U.S.C. §102(b) is improper.

In summary, Applicants respectfully submit that the applied reference does not teach or suggest features recited in each of the rejected independent claims 1, 6, 11, and 16, upon which all other pending claims depend. It is further respectfully submitted that the applied reference also fails to disclose numerous other features recited in the pending dependent claims. Accordingly, it is submitted that the applied art does not provide any teaching, or suggestion within its teaching, which would lead to the features (or advantages) of the instant invention, and the claims patentably define over the art.

The rejection of claims 1-20 under 35 U.S.C. §102(b) is in error and reversal is clearly in order and is courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 12-0429 and please credit any excess fees to such deposit account.

Respectfully submitted,  
LALOS & KEEGAN



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Date: January 9, 2002



APPENDIX

1. A computer implemented remittance payment process, comprising the steps of:

receiving a payor request to make a payment to a payee having a plurality of payment remittance centers, the request including information identifying a payor account number with the payee;

processing the account number to select a single remittance center of the plurality remittance centers to which payment is to be made; and

directing payment to the single remittance center.

2. The computer implemented remittance payment process of claim 1, wherein the account number is processed to identify information of the account number which corresponds to the single remittance center.

3. The computer implemented remittance payment process of claim 2, wherein the identified information of the account number includes one or more alphanumeric characters identifying a single remittance center.

4. The computer implemented remittance payment process of claim 1, wherein the information includes a payor name and address data, and further comprising the steps of:

providing a database including payee records;

processing the information to produce an eleven digit zip code for the payee;

accessing the database to locate payee records corresponding to the eleven digit zip code.

5. The computer implemented remittance payment process of claim 1, further comprising the steps of:

storing, in a database, alteration rules for each payee indicating a format in which that payee is to receive an account number; and

transforming the received account number into an altered account number according to the alteration rules.

6. A remittance payment system, comprising:

*similar to 1*  
a communicative interface configured to receive a payor request to make payment to a payee having a plurality of payment remittance centers, the request including information identifying a payor account number with a payee;

a processor configured to process the account number to select a single payment remittance center of the plurality of payment remittance centers to which payment should be made, and to generate a signal directing payment to the single payment remittance center.

*similar to 2*  
7. The remittance apparatus of claim 6, wherein the processor is further configured to identify information of the account number which corresponds to the single payment remittance center and to select the single payment remittance center based upon the identified information.

*similar to 3*  
8. The computer implemented remittance payment process of claim 7, wherein the identified information of the account number includes one or more alphanumeric characters identifying a single remittance center.

9. The remittance apparatus of claim 6, wherein the information includes a payor name and address data, and further comprising:

*similar to 4*  
a database including payee records;

*direct mapping event*  
a mapping unit configured to process the information to produce an eleven digit zip code for the payee;

a retrieval unit configured to access the database to locate payee records corresponding to the eleven digit zip code.

10. The remittance apparatus of claim 6, further comprising:

a verification unit to verify that the account number conforms to validation rules indicating expected values for

fields of the account number;

a modification unit to alter the account number according to alteration rules expressing processing requirements of a payee to create an altered account number.

11. An article of manufacture for processing payment information, comprising:

computer readable storage medium; and

a computer program stored on the storage medium;

wherein said stored computer program is configured to be readable from said computer readable storage medium by a computer and thereby cause the computer to:

receive a payor request to make payment to a payee having a plurality of payment remittance centers, the request including information identifying a payor account number with a payee;

process the account number to select a single payment remittance center of the plurality of payment remittance centers to which payment is to be made;

generate a signal to direct payment to the single payment remittance center.

12. The article of manufacture of claim 11, wherein the computer program is further configured to cause the computer to process the account number to identify information of the account number and to select the single remittance center based upon the identified information.

13. The article of manufacture of claim 12, wherein the identified information of the account number includes one or more alphanumeric characters identifying a single remittance center.

14. The article of manufacture of claim 11, wherein the computer program is further configured to cause the computer to:

receive a payor's payment information with the request for payment;

process the payment information to produce an eleven digit zip code for the payee; and  
access a database of payee records to locate payee records corresponding to the eleven digit zip code.

*Similar to 5*  
15. The article of manufacture of claim 11, wherein the computer programming is further configured to cause the computer to:  
receive the account number for the payor; and  
transform the account number into an altered account number according to alteration rules stored in a database for each payee indicating a format in which a payee expects to receive an account number.

*Adding the cell*  
16. A system for processing payment information, comprising:  
a communications network;  
a first network station, coupled to the network, generating a payor's payment information, including payee name, address data prepared by the payor, and an account number, and communicating the payment information and the account number to the network;  
and

*Adding the payment*  
a second network station, coupled to the network, receiving a payor's request for payment, the request including information identifying the payor's account number with a payee, the payee having a plurality of remittance centers, processing the account number to identify a single remittance center of the plural remittance centers to which payment is to be sent, and directing payment to the single remittance center.

17. The system for processing payment information of claim 16, wherein a characteristic identifying the single remittance center is located in the account number.

*Some as 3*  
18. The system for processing payment information of claim 17, wherein the characteristic of the account number includes one or more alphanumeric characters identifying a single remittance center.

19. The system of claim 16, wherein:

*Answer 4*  
the second network station further processes the payment information to produce an eleven digit zip code for the payee, accesses a database of payees to locate payee records corresponding to the eleven digit zip code.

20. The system of claim 16, wherein:

*Answer 4*  
the second network station further receives the payor's account number, stores, in a database, alteration rules for each payee indicating a format in which that payee is to receive an the account number, and transforms the received account number into an altered account number according to the alteration rules.